

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
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VIA ECF AND FACSIMILE

March 25, 2016

The Honorable Frank Maas
United States District Court for the S.D.N.Y.
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Room 740
New York, NY 10007-1312

Re: *In Re: Terrorist Attacks on September 11, 2001*, 03 MDL 1570 (GBD) (FM)

Dear Judge Maas:

At the hearing before Your Honor on March 22, 2016, Your Honor heard a motion by defendants Muslim World League and the International Islamic Relief Organization (MWL/IIRO) questioning the authenticity of certain documents that Plaintiffs produced in the litigation. After the parties argued the motion, one of the items that Your Honor permitted was for Plaintiffs to submit for the Court's consideration a particularized showing as to the risk of harm presented by revelation of the identity of the original source of the documents in question. Although my notes from the argument do not reflect it, I have been told that Your Honor indicated a two week time frame for submitting that particularized showing. We are writing to request an extension of that time frame.

Among other concerns about the timing, we anticipate a need to coordinate among multiple individuals, including individuals on distant continents who may be reluctant even to engage us due to fear for their safety. The challenges this reality presents will require substantially more time than two weeks to address the Court's inquiry. In addition, although I anticipate being involved in this process, while doing so I have competing obligations on set schedules that will demand my attention from now through this spring. Accordingly, we are asking for an extension until June 15, 2016 to submit the particularized showing for the Court's consideration.

We have asked MWL/IIRO if they would consent to this extension, but they have declined and agreed to only a two week extension of the original time frame. However, our view

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is that, for the reasons express above, an additional two weeks will not afford us the time needed. Accordingly, we would ask for the extension requested.

Respectfully,

/s/ Robert T. Haefele

ROBERT T. HAEFELE

PLAINTIFFS' EXECUTIVE COMMITTEES

cc: The Honorable George B. Daniels (via Facsimile)
All Counsel of Record (via ECF)